## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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JUL 1 6 2008

UNITED STATES OF AMERICA	)	MAGISTRATE JUDGE MORTON DENLOW
VS.	) )	Magistrate Judge Denlow
CHRISTOPHER BAINES, CHRISTINE BURGOS, CRAIG SMITH, and	)	UNDER SEAL
CHARIEC PARKER	)	

## GOVERNMENT'S MOTION TO SEAL CRIMINAL COMPLAINT, <u>AFFIDAVIT AND ARREST WARRANT</u>

The UNITED STATES OF AMERICA, by its attorney PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, Eastern Division, hereby moves the Court to seal the Criminal Complaint, Affidavit, and Arrest Warrant in the above-captioned case until 5:00 p.m. on August 18, 2008 or until the arrest of Christopher Baines, Christine Burgos, Craig Smith and Charles Parker, whichever occurs first. In support of this motion, the government states as follows:

The government intends to conduct the arrest of Baines, Burgos, Smith and Parker during the next 30 days. Disclosure of the information contained in the Criminal Complaint, Affidavit and Arrest Warrant would jeopardize the ability to make this arrest. The government requests that law enforcement officers be allowed to enter the warrant into law enforcement databases while the Complaint, Affidavit and Warrant are under seal.

WHEREFORE, the United States respectfully requests that the Criminal Complaint, Affidavit and Arrest Warrant in this matter be sealed until 5:00 p.m. on August 18, 2008 or the arrest of Baines, Burgos, Smith and Parker, whichever occurs first.

Respectfully submitted,

PATRICK J. FITZGERALD

United States Attorney

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